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May 16, 2001

Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Re: Filing in CC Docket No. 00-251

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**MAY 17 2001**

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Attached are four (4) copies of a filing in the captioned Docket. Attached as well is a fifth copy for **receipt** purposes. Please stamp and return the receipt copy in the enclosed self addressed, postage paid envelop.

Thank you for your attention to this matter.

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May 16, 2001

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Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

**RECEIVED**

**MAY 17 2001**

**FCC MAIL ROOM**

**Re: CC Docket No. 00-251**  
**In the Matter of Petition of AT&T Communications of Virginia,  
Inc., TCG Virginia, Inc., ACC National Telecom Corp.,  
MediaOne of Virginia and MediaOne Telecommunications  
of Virginia, Inc. for Arbitration of an Interconnection Agreement  
With Verizon Virginia, Inc. Pursuant to Section 252(e)(5) of the  
Telecommunications Act of 1996**

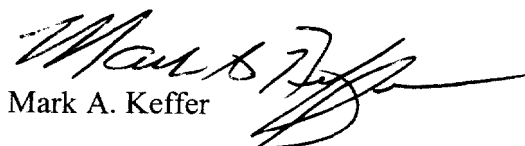
Dear Ms. Salas:

On April 23<sup>rd</sup>, Pursuant to the Commission's *Public Notice* DA 01-270 (released February 1, 2001) and the Arbitrator's *Letter Ruling* (March 26, 2001), AT&T filed its Petition for Arbitration, AT&T's Statement of Unresolved Issues (Attachment A) and its supporting Attachments (B through G). Since that filing, AT&T has found two errors in its issue numbering which are being corrected by this filing.

Specifically, (1) Issue number I.1.A. is being renumbered as Issue I.4., and the text is amended to reflect the parties' shared general principles, already described in the Cox and Worldcom Petitions, and (2) Issue number I.3 concerning reciprocal transit traffic is being renumbered as Issue V.16. (The original petition contained two issues numbered "Issue I.3")

The attached pages, which indicate the appropriate changes, should be substituted for those found in the original filing. None of these proposed changes alters the substance of AT&T's Petition for Arbitration. This letter, with attachments, is being served today on Verizon-Virginia, Inc. and all parties electronically and by first class postage.

Sincerely yours,

  
Mark A. Keffer

cc: Service List

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## NETWORK ARCHITECTURE

### Point of Interconnection

**ISSUE I.1** This issue is shared by AT&T, Cox and WorldCom.

**Should each Party be financially responsible for all of the costs associated with its originating traffic that terminates on the other Parties' network, regardless of the location and/or number of points of interconnection, as long as there is at least one Point of Interconnection per LATA?**

### **SUB-ISSUE I.4.**

**Can Verizon force AT&T to establish a Point of Interconnection at a particular end office, when AT&T traffic to that end office reaches a certain threshold traffic level?**

Witness: Dave Talbott  
Attorney: IV Mellups/Ellen Schmidt

### **General Principles:**

- *CLECs cannot be compelled under the Act to interconnect at ILEC end offices.*
- *A CLEC may voluntarily agree to direct end office trunking under specified circumstances as an accommodation, but it retains the right to choose any technically feasible point of interconnection, including a single POI per LATA.*

### **AT&T's Position:**

AT&T may interconnect at any technically feasible point on Verizon's network, including a single Point of Interconnection ("POI") in the LATA, at its discretion.

Verizon may interconnection to the AT&T network at each AT&T switch, or other

#### **ISSUE I.4.**

**Can Verizon force AT&T to establish a Point of Interconnection at a particular end office, when AT&T traffic to that end office reaches a certain threshold traffic level?**

#### **AT&T's Position:**

No. It is AT&T's right to select the locations at which it interconnects with Verizon's network, and it should not be required to establish a point of interconnection for its traffic at a Verizon end office, when the traffic to that end office reaches an arbitrary threshold proposed by Verizon.

#### **Proposed Remedy:**

Sections 4.0 *et seq.* set forth the terms and conditions necessary to support AT&T's position on this issue.

#### **Verizon's Position:**

Verizon's proposal requires AT&T to establish a POI at a Verizon end office when the traffic to that end office exceeds a CCS busy hour equivalent of 1DS1 for a single month.

#### **Relevant Authorities:**

*Act*, §§ 251(c)(2)(A), 251(c)(2)(B).

C.F.R. 51.305(a)(2)(iii).

First Report and Order, *Implementation of the Local Competition Provision in the Telecommunications Act of 1996*, 11 FCC Rcd. 15499, ¶ 172, 176, 220, 1062 ("Local Competition Order").

Order, *AT&T Communications of SouthWest Inc., Petition for Arbitration of Interconnection Rates, Terms, and Conditions and Related Arrangements with SouthWestern Bell Telephone Company, Pursuant to Section 252(b) of the Telecommunications Act of 1996*, at 9 (March 14, 2001).

**ISSUE V.16 This issue is common to AT&T, Cox and WorldCom.**

<b>Should AT&amp;T have a reciprocal duty to provide transit services to Verizon?</b>
---

Attorney: IV Mellups/Ellen Schmidt  
Witness: Dave Talbott

**AT&T's Position:**

No. AT&T does not have a reciprocal duty to provide transit services to Verizon and none need be imposed.

**Proposed Remedy:**

Section 4.0 *et. seq.* of the attached proposed contract sets forth the contract terms and conditions necessary to support AT&T's position on this issue.

**Verizon Position:**

Verizon proposes that AT&T has a reciprocal duty to provide transit services to Verizon.

**Relevant Authorities:**

*Act*, § 251(c)(2)(B).

First Report and Order, *Implementation of the Local Competition Provision in the Telecommunications Act of 1996*, 11 FCC Rcd. 15499, ¶¶ 172, 176, 220, 1062 ("*Local Competition Order*").

**Explanation of AT&T's Position Including Discussion of Relevant Authority:**

Verizon's provision of transit services stems from its additional interconnection obligations as an incumbent LEC under § 251(c)(2)(B) of the Act, which requires ILECs to provide any requesting telecommunications carrier interconnection with the ILEC's network "for the *transmission and routing* of telephone exchange service and exchange

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

**In the Matter of  
Petition of AT&T Communications  
of Virginia, Inc., Pursuant  
to Section 252(e)(5) of the  
Communications Act, for Preemption  
of the Jurisdiction of the Virginia  
State Corporation Commission  
Regarding Interconnection Disputes  
with Verizon-Virginia, Inc.**

**CC Docket No. 00-251**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 16th day of May, 2001, a copy of a supplemental corrective filing in Docket CC No. 00-251 was hand delivered or sent via overnight delivery to:

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Common Carrier Bureau  
Federal Communications Commission  
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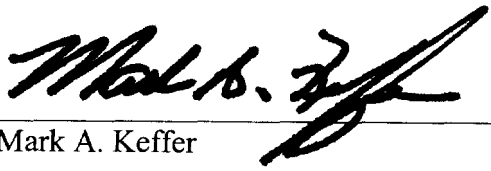
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